

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

IN RE:

**HIGH PLAINS RADIO NETWORK,
LLC,
DEBTOR.**

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CASE NO. 24-70089

**NOTICE REGARDING STIPULATION EXTENDING CERTAIN
DEADLINES RELATED TO LEASE DETERMINATIONS AND SALE
PROCESS**

High Plains Radio Network LLC, Debtor and Debtor in Possession ("Debtor"), hereby provides notice that the Debtor and Vertical Bridge REIT LLC and its Affiliates have entered into, and submitted to the Court as a proposed supplemental and and/or amended order, the stipulation and proposed agreed order attached hereto

This filing is made in order to provide notice to other creditors and parties in interest of the various extensions of time relating to the sale process of the Debtor that are contained in the stipulation.

Dated: January 31, 2025

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

JEFF CARRUTH (TX SBN: 24001846)

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ATTORNEYS FOR
HIGH PLAINS RADIO NETWORK, LLC,
DEBTOR AND DEBTOR IN POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on January 31, 2025 by electronic notice to all ECF users who have appeared in this case to date.

/s/ Jeff Carruth

Jeff Carruth

1/31/25, 8:09 AM

U.S. Bankruptcy Court - Northern District of Texas

Single Order Upload

[24-70089-swe11 High Plains Radio Network, LLC](#)

The new document Stipulation and Agreed Order (High Plains and Vertical Bridge).pdf was uploaded successfully on 1/31/2025 at 8:10 AM

Order type: Hearing Held

[24-70089-swe11 High Plains Radio Network, LLC](#)

Related document number: 253

Related document description: Order on motion to compromise controversy

Order ID: [612125](#)

Hearing date: 1/17/2025

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE: §
HIGH PLAINS RADIO NETWORK, LLC, § CASE NO. 24-70089-swe
DEBTOR. § (Chapter 11, SubV)
§
§

STIPULATION AND AGREED ORDER:

- (I) **SUPPLEMENTING ORDER GRANTING MOTION OF DEBTOR TO APPROVE RESOLUTION AGREEMENT WITH VERTICAL BRIDGE REIT, LLC AND ITS AFFILIATES (DOCKET NO. 253), AND**
- (II) **EXTENDING LEASE DETERMINATION DEADLINE AND SALE DEADLINE REGARDING VERTICAL BRIDGE REIT LLC, AND ITS AFFILIATES AND THE DEBTOR**
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On January 17, 2024, the Court entered the *Order Granting Motion of Debtor to Approve Resolution Agreement with Vertical Bridge REIT, LLC and Its Affiliates* (Docket No. 220) (the “Subject Order”) to approve the Resolution Agreement (as defined in the Subject Order) and other matters between High Plains Radio Network LLC, the Debtor and Debtor in Possession (the “Debtor”) and Vertical Bridge REIT LLC and its Affiliates (collectively, “Vertical Bridge”).

The Subject Order and the Resolution Agreement extended the Code §365(d)(4) lease determination deadline as to Vertical Bridge through and until January 31, 2025.

As evidenced by the signatures of counsel for their respective counsel appearing below, Vertical Bridge and the Debtor stipulate to the following.

1. Vertical Bridge agrees and consents to the extension through and until **February 21, 2025** of the following with respect to the Subject Order and/or the Resolution Agreement (collectively, the “Extensions”):
 - a. the Code §365(d)(4) lease determination deadline, as established in the Subject Order and the Resolution Agreement, as to the Subject Leases (as defined in the Resolution Agreement) of nonresidential real property between the Debtor and Vertical Bridge;
 - b. the deadline stated in Resolution Agreement § 4.04 for the period of time for the marketing of the assets of the Debtor;
 - c. the deadline stated in Resolution Agreement § 4.08 with respect to deemed rejection of the Subject Leases; and
 - d. any other deadlines in the Subject Order and/or the Resolution Agreement that would apply to the sale process of the assets of the Debtor and/or the disposition of the Subject Leases.
2. The effective date of the Extensions is January 30, 2025, irrespective of the entry date of the Agreed Order.
3. The Extensions are without prejudice to further extensions of the Code §365(d)(4) lease determination deadline and other deadlines in the Resolution Agreement as may be agreed by Vertical Bridge and the Debtor.
4. Accordingly, Vertical Bridge and the Debtor request the entry of the Agreed Order appearing below.

IT IS THEREFORE ORDERED THAT:

1. The Stipulations above and the Extensions are approved by the Court as evidencing the agreement of the Debtor and Vertical Bridge.
2. The Subject Order and the Resolution Agreement are amended and/or supplemented (as applicable) by this Agreed Order and shall include the Extensions.
3. The period of time pursuant to 11 U.S.C. §365(d)(4) by which the Debtor may assume or reject leases of nonresidential real property between the Debtor and Vertical Bridge, as contemplated in the Resolution Agreement, is hereby extended through and until **February 21, 2025**.

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4. The Extensions are without prejudice to further extensions of the Code §365(d)(4) lease determination deadline and other matters in the Subject Order and/or the Resolution Agreement as may be agreed by Vertical Bridge and the Debtor.

###END OF ORDER###

{continued on following sheet}

STIPULATION AND AGREED ORDER — Page 3
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AGREED:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

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* Signature by permission by /s/ Jeff Carruth